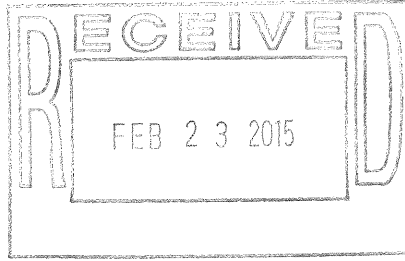


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C O U N S E L O R S A T L A W

Brett A. Snyder
Partner
+1.202.739.5956
bsnyder@morganlewis.com

15-36-LNG

February 23, 2015

VIA HAND DELIVERY

Larine A. Moore
U.S. Department of Energy
FE-34
P.O. Box 44375
Washington, DC 20026-4375

Re: Cameron LNG, LLC Application for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries

Dear Ms. Moore:

Enclosed please find the Application of Cameron LNG, LLC for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement countries and a check for \$50.00 in remittance of the filing fee. Please contact me if you have any questions regarding this submission.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brett A. Snyder".

Brett A. Snyder
Counsel to Cameron LNG, LLC

Enclosure

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

Cameron LNG, LLC)
) FE Docket No. 15- ____ -LNG
)

**APPLICATION OF CAMERON LNG, LLC
FOR LONG-TERM AUTHORIZATION
TO EXPORT LIQUEFIED NATURAL GAS
TO FREE TRADE AGREEMENT NATIONS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the regulations of the United States Department of Energy (“DOE”),² Cameron LNG, LLC (“Cameron LNG”) submits this application (“Application”) to DOE, Office of Fossil Energy (“DOE/FE”) for long-term, multi-contract authorization to export up to 515 billion cubic feet (“Bcf”) per year (approximately equal to 9.97 million metric tons per year (“mtpy”)) of liquefied natural gas (“LNG”) produced from domestic sources. Cameron LNG seeks this authorization for a 20-year period beginning on the earlier of the date of first commercial export from the Expansion Project, as defined below, or seven years from the date the requested authorization is granted by the DOE/FE.

In this Application, Cameron LNG requests authorization to export LNG from the Cameron LNG terminal in Cameron and Calcasieu Parishes, Louisiana (“Cameron Terminal”) to any nation with which the United States has, or in the future may have, a free trade agreement requiring national treatment for trade in natural gas (“FTA”). Cameron LNG seeks this

¹ 15 U.S.C. § 717b (2012).

² 10 C.F.R. § 590 (2014).

authorization both on its own behalf and as agent for other parties who hold title to the LNG at the time of export.³

In support of this Application, Cameron LNG respectfully states the following:

I. COMMUNICATIONS AND CORRESPONDENCE

Any notices, pleadings or other communications concerning this Application should be addressed to:

Brett A. Snyder
Mark R. Haskell
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
(202) 739-3000
bsnyder@morganlewis.com
mhaskell@morganlewis.com

Blair Woodward
General Counsel
Cameron LNG, LLC
2925 Briarpark Drive, Suite 1000
Houston, TX 77042
(832) 783-5582
bwoodward@cameronlng.com

The contacts for any reports required in connection with the requested authorization are as follows:

John O'Leary
Chief Operating Officer
Cameron LNG, LLC
2925 Briarpark Drive, Suite 1000
Houston, TX 77042
(832) 783-5513
joleary@CameronLNG.com

³ Cameron LNG will also separately file for authorization to export an additional 515 Bcf per year to Non-FTA countries.

Richard A. Siegel
Director, Regulatory and Compliance
Cameron LNG, LLC
2925 Briarpark Drive, Suite 1000
Houston, TX 77042
(832) 783-5581
rsiegel@cameronlng.com

II. DESCRIPTION OF THE APPLICANT

Cameron LNG's exact legal name is Cameron LNG, LLC. Cameron LNG is a limited liability company organized under the laws of Delaware. Cameron LNG is an indirect subsidiary of Sempra Energy, GDF SUEZ S.A., Mitsui & Co., Ltd., Mitsubishi Corporation, and Nippon Yusen Kabushiki Kaisha.⁴ Cameron LNG's executive offices are located at 2925 Briarpark Drive, Suite 1000, Houston, Texas 77042. Cameron LNG owns and operates the Cameron Terminal in Cameron and Calcasieu Parishes, Louisiana.

Cameron LNG currently holds two export authorizations from DOE/FE. First, Cameron LNG holds an authorization to export up to 620 Bcf per year to any nation with which the United States has, or in the future may enter into, an FTA requiring national treatment for trade in natural gas. DOE/FE granted Cameron LNG that authorization in Order No. 3059, dated January 17, 2012.⁵ Second, Cameron LNG holds an authorization to export 620 Bcf per year of LNG to any nation with which the United States does not have an FTA requiring national treatment for trade in natural gas and LNG. DOE/FE granted Cameron LNG that authorization in Order No. 3391-A, dated September 10, 2014.⁶ In addition, on December 18, 2014, Cameron LNG filed an

⁴ See *Cameron LNG, LLC*, Order No. 3452, FE Docket No. 14-001-CIC (June 27, 2014).

⁵ *Cameron LNG, LLC*, DOE/FE Order No. 3059 (2012).

⁶ *Cameron LNG, LLC*, DOE/FE Order No. 3391-A, FE Docket No. 11-162-LNG (Sept. 10, 2014).

application in FE Docket No. 14-204-LNG, to export an additional 152 Bcf per year to FTA countries.⁷ That application is pending.

Sempra LNG Marketing, LLC (“SLNG”), a subsidiary of Sempra Energy, holds a blanket authorization to import LNG at the Cameron Terminal.⁸ SLNG also has a blanket authorization to export previously imported (*i.e.*, foreign-sourced) LNG from the Cameron Terminal.⁹

Nothing in this Application is intended to supersede or otherwise modify the import and export authorizations granted to either Cameron LNG or SLNG or Cameron LNG’s December 18, 2014 application in FE Docket No. 14-204-LNG.

III. DESCRIPTION OF CAMERON LNG TERMINAL AND EXPANSION PROJECT

In this Application, Cameron LNG seeks a long-term, multi-contract authorization to export additional volumes of domestically produced LNG from the Cameron Terminal. Cameron LNG is planning to construct two additional liquefaction trains (Trains 4 and 5) and ancillary facilities at the Cameron Terminal for export to foreign markets (the “Expansion Project”). The trains will increase the facility’s capacity by 515 Bcf per year (approximately 9.97 mtpy of LNG). The Expansion Project facilities will be integrated into the existing Cameron Terminal, including Trains 1–3. Cameron LNG hereby incorporates by reference the description of the Cameron Terminal and the Expansion Project set forth in Cameron LNG’s application in FE Docket No. 11-145-LNG¹⁰ and in DOE/FE Order No. 3059.¹¹

⁷ Application of Cameron LNG, LLC for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries, FE Docket No. 14-204-LNG (Dec. 18, 2014).

⁸ *Sempra LNG Marketing, LLC*, DOE/FE Order No. 3456 (2014).

⁹ *Sempra LNG Marketing, LLC*, DOE/FE Order No. 2885 (2010).

¹⁰ *See* Application of Cameron LNG, LLC for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries, FE Docket No. 11-145-LNG (Nov. 10, 2011).

¹¹ *See* Order No. 3059 at 3-5.

On June 19, 2014, the Federal Energy Regulatory Commission (“FERC”) issued an order authorizing Cameron LNG to site, construct, and operate the initial liquefaction and export facilities (“FERC Order”) at the Cameron Terminal.¹² Cameron LNG will submit an application to FERC for authorization to site, construct, and operate the additional facilities comprising the Expansion Project. Cameron LNG intends to begin the pre-filing process at FERC in February 2015 and to file its application in the third quarter of 2015.

The application process at FERC will include FERC’s environmental review as required under the National Environmental Policy Act of 1969.¹³

IV. AUTHORIZATION REQUESTED

In this Application, Cameron LNG requests long-term, multi-contract authorization to export an additional 515 Bcf per year (approximately 9.97 mtpy) of domestically produced LNG from the Cameron Terminal. This authorization is requested for a 20-year term beginning on the earlier of the date of first commercial export from the Expansion Project or seven years from the date the authorization is granted by the DOE/FE. Cameron LNG seeks authorization to export LNG to any FTA nation.

Cameron LNG requests authorization to export LNG on its own behalf (by holding title to the LNG at the time of export) or by acting as agent for others who themselves hold title to the LNG. If Cameron LNG exports LNG on its own behalf, Cameron LNG may either take title to the gas at a point upstream of the Cameron Terminal or may purchase LNG from a Cameron Terminal customer before export. In other cases, Cameron LNG will act as agent for the customers of the Cameron Terminal without taking title to facilitate the export of the customer’s

¹² *Cameron LNG, LLC*, 147 FERC ¶ 61,230 (2014).

¹³ 42 U.S.C. § 4321 *et seq.* (2012).

LNG. To ensure that all exports are permitted and lawful under United States laws and policies, Cameron LNG will comply with all DOE/FE requirements for an exporter or agent.

In Order No. 3059, DOE/FE approved Cameron LNG's proposal to register each LNG title holder for whom Cameron LNG seeks to export LNG as agent. As approved therein, the registration is to include a written statement by the title holder acknowledging and agreeing to comply with all applicable requirements included in its DOE/FE export authorization. DOE/FE also approved Cameron LNG's proposal to file under seal with DOE/FE any relevant long-term commercial agreements that it reached with the LNG title holders on whose behalf the exports were performed. Cameron LNG seeks the same agent authority as that provided in Order No. 3059.

Cameron LNG also requests that DOE/FE not require the submission with this Application of transaction-specific information, pursuant to Section 590.202(b) of the DOE's regulations. DOE/FE has previously found that, given the stage of development for these projects, it was appropriate for the applicants to submit such information when practicable. In Order No. 3059, DOE/FE required Cameron LNG to submit transaction-specific information within 30 days of the execution of the applicable agreements. The submittal of the transaction-specific information identified in section 590.202(b) at the time the applicable agreements are executed is appropriate in light of current market conditions and contracting practices.

V. STANDARD OF REVIEW

Under Section 3(c) of the NGA, as amended by Section 201 of the Energy Policy Act of 1992,¹⁴ an application for authorization to export natural gas, including LNG, to any "nation with which there is in effect a free trade agreement requiring national treatment for trade in natural

¹⁴ *Id.* § 201.

gas, shall be deemed to be consistent with the public interest, and ... shall be granted without modification or delay.”¹⁵ In light of this statutory obligation, DOE/FE has found that it need not engage in any analysis of factors affecting the public interest.¹⁶ As this Application falls within Section 3(c) as amended, it should be processed and approved in accordance with this standard.

VI. APPENDICES

The following appendices are included with this Application:

Appendix A	Verification
Appendix B	Opinion of Counsel

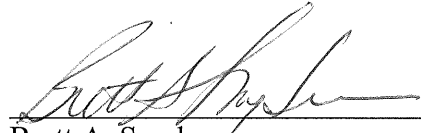
VII. CONCLUSION

For the reasons set forth above, Cameron LNG respectfully requests that the DOE issue an order granting Cameron LNG authorization to export for a period of 20 years (beginning on the earlier of the date of first commercial export from the Expansion Project or seven years from the date the requested authorization is granted) up to 515 Bcf per year (equivalent to approximately 9.97 mtpy) of LNG produced from domestic sources to any nation with which the United States has, or in the future may have, an FTA requiring national treatment for trade in natural gas.

¹⁵ 15 U.S.C. § 717b(c).

¹⁶ *Id.*

Respectfully submitted,



Brett A. Snyder

Mark R. Haskell

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW

Washington, D.C. 20004

(202) 739-3000

bsnyder@morganlewis.com

mhaskell@morganlewis.com

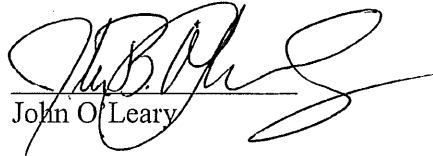
Dated: February 23, 2015

APPENDIX A

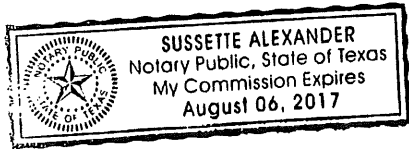
VERIFICATION

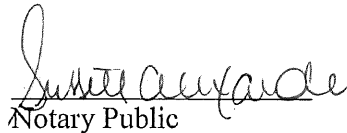
County of Harris)
)
State of Texas)

BEFORE ME, the undersigned authority, on this day personally appeared Mr. John O'Leary, who, having been by me first duly sworn, on oath says that he is Chief Operating Officer for Cameron LNG, LLC, and is duly authorized to make this Verification on behalf of such company, that he has read the foregoing instrument, and that the facts therein stated are true and correct to the best of his knowledge, information and belief.


John O'Leary

SWORN TO AND SUBSCRIBED before me on the 23 day of February, 2015.




Notary Public

APPENDIX B

OPINION OF COUNSEL

February 23, 2015

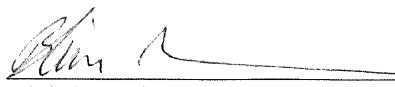
Ms. Larine A. Moore
U.S. Department of Energy
FE-34
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: Cameron LNG, LLC Application for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries

Dear Mr. Anderson:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the United States Department of Energy, 10 C.F.R. § 590.202(c) (2014). I am counsel to Cameron LNG, LLC ("Cameron LNG"). I have reviewed the organizational and internal governance documents of Cameron LNG and it is my opinion that the proposed export of natural gas as described in the application filed by Cameron LNG, to which this Opinion of Counsel is attached as Appendix B, is within the company powers of Cameron LNG.

Respectfully submitted,


Blair Woodward
Counsel to Cameron LNG, LLC